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August 22, 2000

VIA HAND DELIVERY

Magalie Roman Salas, Esquire
Secretary
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The Portals
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554

Re: WT Docket No. 00-48
RM-9499

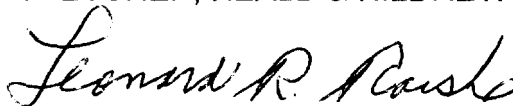
Dear Ms. Salas:

On behalf of Globe Wireless, Inc. ("Globe Wireless"), we are filing an original and five (5) copies of its Comments in the above-referenced matter.

If there are questions, do not hesitate to call the undersigned at (703) 812-0480.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC



Leonard R. Raish

LRR:cej
Enclosures

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ORIGINAL

BEFORE THE

Federal Communications Commission

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WASHINGTON, D.C. 20554

AUG 22 2000

In the Matter of)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Amendment of Parts 13 and 80 of the)
Commission's Rules concerning)
Maritime Communications)

WT Docket No. 00-48

Petition for Rule Making Filed by)
Globe Wireless, Inc.)

RM-9499

Federal Communications Bar Association's)
Petition for Forbearance from Section 310(d))
of the Communications Act Regarding Non-)
Substantial Assignments of Wireless Licenses)
and Transfers of Control involving)
Telecommunications Carriers)

and)

Personal Communications Industry Association's)
Broadband Personal Communications Services)
Alliance's Petition for Forbearance for Broadband)
Personal Communications Services)

COMMENTS OF GLOBE WIRELESS, INC.

Pursuant to Section 1.415 of the Commission's Rules, Globe Wireless, Inc. hereby files these comments in the above-captioned proceeding.¹

Globe Wireless, a major provider of HF maritime communications, is the original petitioner for rulemaking in RM-9499. Globe Wireless generally supports the Commission's proposals to streamline and clarify its Rules, and to remove obsolete and redundant provisions.

¹Amendment of Parts 13 and 80 of the Commission's Rules Concerning Maritime Communications, WT Docket No. 00-48, Notice of Proposed Rule Making and Memorandum Opinion and Order, FCC 00-105 (released March 24, 2000) (Notice).

A. Proposal to Allow J2B and J2D on Frequencies Currently Reserved for Morse Code is Supported

The Commission notes that 744 frequencies in the HF band assignable to maritime stations are limited to Morse Code transmissions.² Because even a skilled Morse Code operator sends information at a far slower rate than is possible with more modern methods, this restriction yields inefficient use of the spectrum.³ For that reason, WRC-97 amended the ITU Radio Regulations to permit the use of J2B (radio-teletypewriter) and J2D (data transmissions, telemetry, and telecommand) emissions on a non-interference basis to AIA (Morse Code) operations.⁴ The Commission now proposes to implement the Radio Regulations by amending its Rules to allow J2B, J2D and equivalent data transmissions on frequencies currently reserved for Morse Code Transmissions (AIA).

Globe Wireless supports the amendment. Both J2B and J2D emissions represent a substantial efficiency advantage over manual Morse code. The Commission should adopt the amendment, not only as a matter of international comity, but also to promote the use of higher-speed communications in scarce HF spectrum. This rule change will not disadvantage any user of the spectrum, is plainly in the public interest, and will increase substantially the efficient use of the spectrum involved. Globe Wireless applauds the Commission for these proposed rule changes.

²Notice at para. 25.

³For example, a Morse code speed of 20 wpm – the highest speed required for any amateur license, 47 C.F.R. § 97.503(a)(3) – is equivalent to a text data rate of only 14 bits per second. For comparison, even a telephone-grade voice channel with a conventional analog modem can transmit data thousands of times faster.

⁴Notice at para. 24.

B. Update of Part 80 Rules and Regulations

In paragraph 16 the Commission proposes to modify Section 80.1111(d), 80.1113(d), and 80.117(a) to incorporate the latest guidance from IMO and ITU. Among these modifications is a proposal to require a ship receiving a DSC distress call monitor the associated distress voice traffic channel for five minutes, and monitor the DSC distress and safety channel until the call has been acknowledged. Globe Wireless urges the Commission to limit these requirements to distress calls received on VHF or 2 MHz. Under the present rules, the large number of irrelevant calls motivates ship crews to disable their systems. A limitation to VHF and 2 MHz will better ensure that distress calls from nearby vessels are received. Globe Wireless strongly believes the interests of maritime safety are better served if ships actually hear and respond to distress calls in the vicinity, than if they are expected to monitor calls coming from a wider area, but in fact monitor none.

In paragraph 17 the Commission proposes to amend Section 80.1071 of its Rules to provide a general exemption from selected GMDSS requirements for all vessels which sail continuously within 20 miles of the Coast until one year after the Coast Guard establishes "Sea Area 1" coast stations. Globe Wireless proposes that ships should qualify for an exemption if they are equipped with INMARSAT-C (Single unit) or MF/HF DSC (single unit), a 406 MHz EPIRB, plus a radiotelephone system for their survival craft. Basically, as seen by Globe Wireless, reliable ship-to-ship as well as ship-to-shore distress and safety communications are needed.

In Paragraph 25, the Commission seeks comments as to the practicability of a voluntary watch on 2182 kHz and proposes further that voluntary DSC equipped ship be required to

maintain a watch on VHF channel 70 whenever the vessel is underway. Globe Wireless urges the Commission to discard the idea of a voluntary 2182 kHz watch. This would necessarily be an aural watch on the vessel's bridge, where crew members' attention is already stretched thin. Globe Wireless doubts that such a watch would be routinely maintained in practice, and to provide for it in the Rules could generate a false sense of security. The channel 70 watch, on the other hand, would contribute to safety by promoting effective communications between compulsory and voluntary ships.

With regard to the Rules contained in Subpart R,⁵ Globe Wireless concurs they are redundant and could be eliminated now. An exception would be Section 80.879 setting forth Radar requirements. Globe Wireless concurs with retaining the aforementioned Section. Note is taken Section 80.879 refers to Section 80.825 which is also being retained.

Fishing Vessel Exemption. The Commission proposes extending the temporary exemption of the GMDSS DSC rules for fishing vessels of 300 gross tons or more until one year after the U.S. Coast Guard establishes adequate DSC coast facilities for Sea Areas A1 and A2.⁶ Once those facilities are in place, the Commission proposes to require fishing vessels of 300 gross tons and over to comply with all of the GMDSS requirements appropriate to the area of operation.

Globe Wireless respectfully disagrees. Fishing vessels tend to remain within well defined areas, usually with other members of the fleet close by. For these reasons, fishing vessels require less in the way of radio equipment than do ships that operate in isolation virtually anywhere.

⁵Notice at para. 28.

⁶Notice at para. 33.

Globe Wireless believes fishing vessels will be adequately protected if they carry Inmarsat-C with EGC, an HF radio with or without DSC, and a VHF radio with DSC.

CONCLUSION

Globe Wireless applauds the Commission for including RM-9499 in this proceeding to bring Parts 13 and 80 of its Rules up-to-date. The proposal to implement the Radio Regulations of the ITU by amending the Rules to allow J2B, J2D and equivalent data transmissions on spectrum currently reserved for Morse (A1A) and voice (J3E) transmissions is strongly supported. Other points made herein above are commended for most favorable consideration by the Commission.

Respectfully submitted,

GLOBE WIRELESS INC.

By: Leonard R. Raish

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Date: August 23, 2000

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